

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS  
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**ROBERT E. BELUE, et al.,  
vs. ASBESTOS DEFENDANTS:  
A.O. SMITH ELECTRICAL PRODUCTS, et. al.**

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

ROBERT E. BELUE, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.  
2:06-CV-1034-WKW

ASBESTOS DEFENDANTS:  
A.O. SMITH ELECTRICAL PRODUCTS, et al.,

Defendants.

/

**JOINDER AND ADOPTION IN  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation and hereby join in and adopt as though fully set forth Borg Warner Corporation, Exteco, Inc. and Marley-Wylain Company's Motion For Partial Summary Judgment filed herein on April 1, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation respectfully request this Honorable Court to grant Borg Warner Corporation, Exteco, Inc. and Marley-Wylain Company's Motion For Partial Summary Judgment filed herein

on April 1, 2008 and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 21st day of April, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher  
Evelyn M. Fletcher (FLE 019)  
AL Bar No. ASB-1485-C19E  
Elizabeth B. Padgett (PAD015)  
Alabama Bar No. ASB-3936-C60P

Counsel for Foseco, Inc., Maremont Corporation  
and Union Carbide Corporation

4000 SunTrust Plaza  
303 Peachtree Street, N.E.  
Atlanta, GA 30308-3243  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.  
Law Offices of G. Patterson Keahey, P.C.  
One Independence Plaza, Suite 612  
Birmingham, AL 35209

This 21st day of April, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher  
Evelyn M. Fletcher (FLE019)  
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